Case 20-13901-pmm Doc 96 Filed 11/05/21 Entered 11/05/21 09:28:34 Desc Main Document Page 1 of 3

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Robert Koch Eby, III Chapter 13

Debtor(s) Case No. 20-13901-PMM

Matter: Motion to Discontinue Wage Deduction

#### MOTION TO DISCONTINUE WAGE DEDUCTION

AND NOW, come the Debtor(s), Robert Koch Eby, III, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Discontinue Wage Deduction and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about September 29, 2020.
- 2) Debtor Robert Koch Eby, III receives regular income from employment with Cassel which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
  - 3) Debtor wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: November 5, 2021 /s/ Robert Koch Eby, III

Debtor

### **DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire PA ID No. 201207 2132 Market Street Camp Hill, PA 17011 (717) 975-9446 pmurphy@dplglaw.com Attorney for Debtor(s) Case 20-13901-pmm Doc 96 Filed 11/05/21 Entered 11/05/21 09:28:34 Desc Main Document Page 2 of 3

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## **ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion to Discontinue Wage Deduction, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor Robert Koch Eby, III receives income should immediately cease the wage attachment in the amount of \$282.91 from each weekly paycheck.

Case 20-13901-pmm Doc 96 Filed 11/05/21 Entered 11/05/21 09:28:34 Desc Main Document Page 3 of 3

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### CERTIFICATE OF SERVICE

I hereby certify that on Friday, November 5, 2021, I served a true and correct copy of the **Debtor(s)' Motion to Discontinue** 

Wage Deduction Order and proposed Order in this proceeding upon the following:

### Via USPS First Class Mail

Cassel

Attn: Payroll Administrator 784 Fruitville Pike Manheim, PA 17545

### Via Electronic Means

Scott F. Waterman, Esquire Standing Chapter 13 Trustee 2901 Sant Lawrence Avenue PO Box 4010 Reading PA 19606

Office of the United States Trustee Custom House 200 Chestnut Street, Suite 502 Philadelphia, PA 19106

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P. Paralegal for Paul D. Murphy-Ahles, Esquire